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(3WP42)

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October 25, 2010

Ms. Ingrid H. Hopkins Water Protection Division (3WP42) U.S. EPA - Region III 1650 Arch Street Philadelphia, PA 19103-3029 (215) 814-5437 hopkins.ingrid@epa.gov

RE: Benning Road Generating Station – NPDES Permit No. DC 0000094

Metal Excursions – Outfall 013Q

Dear Ms. Hopkins:

This letter is a follow-up to the October 22, 2010 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff, EHS Manager, to report copper, iron and zinc excursions from a grab storm water sample taken on September 30, 2010 from Outfall 013.

On October 22, Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Ms. Brinkerhoff made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Lab results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	25.0
Iron	mg/L	1.0	2.1
Zinc	ug/L	117.18	140.0

Investigation of the excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Road Generating Station indicates that the October 22, 2010 values are comparative to historical values, i.e., typical metal concentrations found in storm water samples dating back several years are similar to those seen in recent analysis.

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On July 19, 2010, the facility submitted to EPA a TMDL Implementation Plan, as required by NPDES permit condition VII.E. The TMDL Plan provided information on past, current, and planned activities at the facility to meet the required load reductions for the Anacostia River TMDLs for metals. Following EPA approval of the plan, the facility will implement those best management practices listed in the plan to reduce the TMDL and consequently resolve any future metal excursions.

Please contact me at (703) 253-1787 or by electronic mail at sharmon@pepcoenergy.com if you need additional information.

Respectfully yours,

S. H. Harmox

Shirley H. Harmon

Power Plant Asset Manager

CC:

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